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Attorneys for Defendants
HAYWARD AREA RECREATION AND PARK
DISTRICT and KEVIN HART

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JOSEPH P. CUVIELLO and DENIZ
BOLBOL, individually,

Plaintiff,

v.

ROWELL RANCH RODEO, INC.,
HAYWARD AREA RECREATION AND
PARK DISTRICT, HAYWARD AREA
RECREATION AND PARK DISTRICT
PUBLIC SAFETY MANAGER/RANGER
KEVIN HART, and DOES 1 and 2, in
their individually and official capacities,
jointly and severally,

Defendants.

Case No. 3:23-cv-01652-VC

DECLARATION OF NICHOLAS D. SYREN

Hon. Vince Chhabria

I, Nicholas D. Syren, declare as follows:

1. I am an attorney licensed to practice before the United States District Court for the Northern District of California. I am an associate at the law firm of Allen, Glaessner, Hazelwood & Werth, LLP, and am counsel of record for defendants HAYWARD AREA RECREATION AND PARK DISTRICT and KEVIN HART (“Defendants”) in this matter.

2. I have personal knowledge of the statements made in this declaration and could competently testify to them if called as a witness.

3. On June 27, Defendants filed both an Opposition to Plaintiffs’ Joint Motion for

1 Summary Judgment and associated filings, (Dkt. 90-96), and Motion for Summary Judgment or
2 in the alternative, Summary Adjudication, (Dkt. 97-102).

3 4. In order to comply with the operative Standing Order for Civil Cases Before Judge
4 Vince Chhabria Paragraph 41, Defendants file the present Cross Motion for Summary Judgment
5 or in the alternative, Summary Adjudication and Opposition to Plaintiffs' Joint Motion for
6 Summary Judgment.

7 5. Defendants request this Court please disregard the previous filings (Dkt. 90-102)
8 and only review the present Cross Motion Cross Motion for Summary Judgment or in the
9 alternative, Summary Adjudication and Opposition to Plaintiffs' Joint Motion for Summary
10 Judgment and associated filings.

11 6. The present Cross Motion contains the same information as the prior motion for
12 summary judgment and no parties will be prejudiced by this additional filing.

13 7. The only portion of the previous exhibits filed June 27, 2024, which should be
14 reviewed by this Court are the CDs (hard copies), or Exhibits E and F to the Declaration of
15 Nicholas D. Syren lodged with the Court.

16 I declare under penalty of perjury, under the laws of the United States of America, that the
17 foregoing is true and correct. Executed on June 28, 2024, at San Francisco, California.

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20 /s/ Nicholas D. Syren
21 NICHOLAS D. SYREN
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